

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

State of New York, *et al.*

*Plaintiffs,*

v.

Case No. 1:25-cv-1144-JAV

U.S. Department of the Treasury, *et. al.*

*Defendants.*

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I, Mark Vetter, declare under penalty of perjury:

1. I currently serve as the Deputy Assistant General Counsel (Ethics) at the U.S. Department of the Treasury (Treasury), and I also serve as Treasury's Alternate Designated Agency Ethics Official (ADAEO). I have served in this role since July 2022. I am a career civil servant.
2. In my current role, I oversee, among other things, the day-to-day administration of the agency's ethics program, which includes determining the particular ethics requirements for all Treasury employees, assigning ethics training to all Treasury employees, and assigning forms for completion to all Treasury employees who are required by regulation to complete them.
3. By regulation at 5 C.F.R. § 2638.304(b), all new Treasury employees must complete new employee ethics training (Ethics Training) within three months of onboarding.
4. By regulations at 5 C.F.R. Part 2634, the Office of Government Ethics (OGE) Public Financial Disclosure Form 278 (OGE 278) must be filled out by certain Treasury employees, including those who meet the following criteria: (1) they have been appointed at the GS-7 level or above; (2) they have been appointed under Treasury's authority pursuant to 5 C.F.R. § 213.3302 to establish temporary transitional Schedule C (Schedule C) positions; and (3)

they have not been appointed as a Special Government Employee (SGE) who will serve a term of 60 days or less. An OGE 450 is required to be completed where an SGE does not file an OGE 278 pursuant to 5 C.F.R. § 2634.904(a)(2).

5. I have been involved in ensuring that Tom Krause (Krause), Samuel Corcos (Corcos), Linda Whitridge (Whitridge), and Todd (Newnam), individuals of the Department of Government Efficiency (DOGE) team established at Treasury (Treasury DOGE Team), have completed the Ethics Training and, as required, filed an OGE 278.

**Tom Krause**

6. Krause completed the Ethics Training on February 20, 2025.
7. Krause onboarded as a consultant and also designated as an SGE. On February 13, 2025, Krause was later appointed to a Schedule C position at the level of GS-15, but remained an SGE. At this time, even though Krause's length of appointment was undetermined, the Department Ethics Office (DOE) did not request that Krause submit a draft of the OGE 278. However, on March 5, 2025, Krause's length of appointment was finalized to not exceed 120 days, the maximum length permitted under appointment authority 5 C.F.R. § 213.3302 (Temporary Transitional Schedule C Positions). DOE then required that Krause file an OGE 278, which he did on March 24, 2025. It is currently under review by DOE.
8. Krause has complied with all Treasury ethics training and filing requirements.

**Samuel Corcos**

9. Corcos completed the Ethics Training on April 2, 2025.
10. Corcos onboarded as an SGE with an appointment not to exceed 120 days. Although an SGE is only required to file an OGE 278 if they serve more than sixty days in a year, DOE requested that Corcos complete a draft of the OGE 278 because his length of appointment

was undetermined and this would allow him to quickly submit the report if he was in fact going to exceed the 60-day threshold. Even though he was not required to do so at the time, Corcos filed an OGE 278 on February 25, 2025. I certified Corcos's OGE 278 on February 27, 2025.

11. Corcos has complied with all Treasury ethics training and filing requirements.

**Linda Whitridge**

12. Whitridge completed the Ethics Training on March 11, 2025.

13. Whitridge meets the criteria for the OGE 278 requirements: (1) she was onboarded at the level GS-12; (2) she is a Schedule C employee; and (3) she is not designated as an SGE.

Whitridge filed her OGE 278 on March 24, 2025 and it is currently under review by the Department Ethics Office.

14. Whitridge has complied with all Treasury ethics training and filing requirements.

**Todd Newnam**


15. Newnam completed the Ethics Training on March 16, 2025.

16. Newnam meets the criteria for the OGE 278 requirements: (1) he was onboarded at the level GS-15; (2) he is a Schedule C employee; and (3) he is not designated as an SGE. Newnam filed his OGE 278 on April 2, 2025 and it is currently under review by the Department Ethics Office.

17. Newnam has complied with all Treasury ethics training and filing requirements.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 4/22/2025

Signed:   
Mark Vetter  
Deputy Assistant General Counsel (Ethics)  
United States Department of the Treasury